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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047  
MDL No. 3047

14 This Document Relates to:  
15 ALL ACTIONS

**OMNIBUS SEALING STIPULATION  
REGARDING JOINT LETTER BRIEF  
REGARDING RELEVANT TIME  
PERIOD APPLICABLE TO  
BYTEDANCE DOCUMENT SEARCH  
AND PRODUCTION**

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs and Defendants TikTok, Ltd., TikTok, LLC, TikTok, Inc., ByteDance Ltd., and ByteDance Inc. (collectively referred to in this submission as "TikTok Defendants," and with Plaintiffs as the "Parties") submit this Omnibus Sealing Stipulation Regarding Joint Letter Brief Regarding Relevant Time Period Applicable to ByteDance Document Search and Production.

On May 1, 2024, the Parties filed their Joint Letter Brief Regarding Relevant Time Period Applicable to ByteDance Document Search and Production (hereinafter "Joint Letter Brief") (ECF No. 798), together with a Joint Temporary Sealing Motion (ECF No. 799). The Parties filed the Joint Letter Brief with confidentiality redactions (at ECF No. 798), and submitted a sealed unredacted copy of the Joint Letter Brief to the Court (ECF No. 799-1).

The Parties now agree that the following portions of the Joint Letter Brief should remain sealed:

Docket No.	Language to Be Redacted	Basis for Sealing Redactions
ECF Nos. 798/799-1	Redaction beginning on page 1 and extending into page 2: beginning after "Indeed," on page 1 and ending before "Thus," on the first line of page 2.	The language that is the subject of redaction discusses the TikTok Defendants' confidential platform design, testing, and marketing and business strategies; and further characterizes and/or directly quotes from confidential internal memos regarding the same. Disclosure of this information would provide the TikTok Defendants' competitors with insights into the TikTok Defendants' business that they would not otherwise have, and thereby cause competitive harm to the TikTok Defendants. <i>See Declaration of Noreen Yeh; see also Nixon v. Warner Commc'ns, Inc.</i> , 435 U.S. 589, 598 (1978) (stating that "sources of business information that might harm a litigant's competitive standing" properly may be sealed); <i>Phillips ex rel. Estates of Byrd v. General Motors Corp.</i> , 307 F.3d 1206, 1211 (9th Cir. 2002) ("The law . . . gives district courts broad latitude to grant
ECF Nos. 798/799-1	Redaction on the second line of page 2: beginning after "Thus," and ending before "And" on line 2 of page 2.	
ECF Nos. 798/799-1	Redaction beginning on the third line of page 2: beginning after "And" and extending to the end of the paragraph.	
ECF Nos. 798/799-1	Redaction in the third paragraph of page 2: beginning after "When ByteDance launched TikTok," and ending before "The company spent massively."	
ECF Nos. 798/799-1	Redaction in the fourth paragraph of page 2: beginning after "For example," and	

1	ending before “Given how completely.”	protective orders to prevent disclosure of materials for many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information.”).
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The Parties agree that the portions of the Joint Letter Brief not listed in the above chart may be unsealed. The TikTok Defendants do not waive, and expressly reserve, their right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the Joint Letter Brief. The confidentiality or appropriateness of sealing material other than cited portions of the Joint Letter Brief is not currently at issue, and the TikTok Defendants do not waive any right with respect to that material.

Plaintiffs’ agreement to allow portions of the Joint Letter Brief to remain under seal is made in a good faith effort to resolve the current dispute and is not a concession that the agreed redactions are mandated by law. Plaintiffs’ agreement extends solely to the copy of the Joint Letter Brief and, as such, does not extend to any underlying documents or information within those documents. Plaintiffs reserve all rights to oppose sealing this same or similar information in the future, as well as to unseal or de-designate the Joint Letter Brief in its entirety in the future.

Pursuant to this Court’s sealing procedures, the following are attached hereto: (i) a modified copy of the Joint Letter Brief, with the redactions agreed by the Parties listed above; (ii) the Declaration of Noreen Yeh supporting the requests to seal; and (iii) a Proposed Order On Undisputed Sealing Requests.

**IT IS SO STIPULATED**, through Counsel of Record.

Dated: May 22, 2024

Respectfully submitted,

/s/ *Lexi J. Hazam* \_\_\_\_\_  
LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

1 PREVIN WARREN  
2 **MOTLEY RICE LLC**  
3 401 9th Street NW Suite 630  
4 Washington DC 20004  
5 Telephone: 202-386-9610  
6 pwarren@motleyrice.com

7 Co-Lead Counsel

8 CHRISTOPHER A. SEEGER  
9 **SEEGER WEISS, LLP**  
10 55 Challenger Road, 6<sup>th</sup> floor  
11 Ridgefield Park, NJ 07660  
12 Telephone: 973-639-9100  
13 Facsimile: 973-679-8656  
14 cseeger@seegerweiss.com

15 Counsel to Co-Lead Counsel and Settlement  
16 Counsel

17 JENNIE LEE ANDERSON  
18 **ANDRUS ANDERSON, LLP**  
19 155 Montgomery Street, Suite 900  
20 San Francisco, CA 94104  
21 Telephone: 415-986-1400  
22 jennie@andrusanderson.com

23 Liaison Counsel

24 JOSEPH G. VANZANDT  
25 **BEASLEY ALLEN CROW METHVIN**  
26 **PORTIS & MILES, P.C.**  
27 234 Commerce Street  
28 Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

1  
2 JAMES J. BILSBORROW  
3 WEITZ & LUXENBERG, PC  
4 700 Broadway  
5 New York, NY 10003  
6 Telephone: 212-558-5500  
7 Facsimile: 212-344-5461  
8 jbilsborrow@weitzlux.com

9  
10 PAIGE BOLDT  
11 **WATTS GUERRA LLP**  
12 4 Dominion Drive, Bldg. 3, Suite 100  
13 San Antonio, TX 78257  
14 Telephone: 210-448-0500  
15 PBoldt@WattsGuerra.com

16 THOMAS P. CARTMELL  
17 **WAGSTAFF & CARTMELL LLP**  
18 4740 Grand Avenue, Suite 300  
19 Kansas City, MO 64112  
20 Telephone: 816-701 1100  
21 tcartmell@wcllp.com

22 JAYNE CONROY  
23 **SIMMONS HANLY CONROY, LLC**  
24 112 Madison Ave, 7<sup>th</sup> Floor  
25 New York, NY 10016  
26 Telephone: 917-882-5522  
27 jconroy@simmonsfirm.com

28 SARAH EMERY  
29 **HENDY JOHNSON VAUGHN EMERY, PSC**  
30 2380 Grandview Drive  
31 Ft. Mitchell, KY 41017  
32 Telephone: 888-606-5297  
33 semery@justicestartshere.com

34 CARRIE GOLDBERG  
35 **C.A. GOLDBERG, PLLC**  
36 16 Court St.  
37 Brooklyn, NY 11241  
38 Telephone: (646) 666-8908  
39 carrie@cagoldberglaw.com

40 RONALD E. JOHNSON, JR.  
41 **HENDY JOHNSON VAUGHN EMERY, PSC**  
42 600 West Main Street, Suite 100  
43 Louisville, KY 40202  
44 Telephone: 859-578-4444  
45 rjohnson@justicestartshere.com

1  
2 SIN-TING MARY LIU  
3 AYLSTOCK WITKIN KREIS &  
4 OVERHOLTZ, PLLC  
5 17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

6 JAMES MARSH  
7 **MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

8  
9 ANDRE MURA  
10 **GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

11  
12 HILLARY NAPPI  
13 **HACH & ROSE LLP**  
14 112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

15  
16 EMMIE PAULOS  
17 **LEVIN PAPANTONIO RAFFERTY**  
18 316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

19  
20 RUTH THI RIZKALLA  
21 **THE CARLSON LAW FIRM, P.C.**  
22 1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

23  
24 ROLAND TELLIS  
DAVID FERNANDES  
25 **BARON & BUDD, P.C.**  
26 15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street  
Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

MELISSA YEATES  
JOSEPH H. MELTZER  
**KESSLER TOPAZ MELTZER & CHECK,  
LLP**  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellosevitt.com

*Attorneys for Plaintiffs*

/s/ Andrea Roberts Pierson  
Andrea Roberts Pierson, *pro hac vice*  
andrea.pierson@faegredrinker.com  
Amy Fiterman, *pro hac vice*  
amy.fiterman@faegredrinker.com  
Faegre Drinker LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: +1 (317) 237-0300  
Facsimile: +1 (317) 237-1000

1                   **KING & SPALDING LLP**  
2

3                   */s/ Geoffrey M. Drake*  
4                   Geoffrey M. Drake, *pro hac vice*  
5                   gdrake@kslaw.com  
6                   David Mattern, *pro hac vice*  
7                   dmattern@kslaw.com  
8                   King & Spalding LLP  
9                   1180 Peachtree Street, NE, Suite 1600  
10                  Atlanta, GA 30309  
11                  Telephone: + 1 (404) 572-4600  
12                  Facsimile: + 1 (404) 572-5100  
13                  *Attorneys for Defendants TikTok Inc., ByteDance*  
14                  *Inc., ByteDance Ltd., TikTok Ltd., and TikTok,*  
15                  *LLC*